

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND**

ALLEN VIDEO TECHNOLOGY, INC.

Plaintiff,

v.

OPTOMA TECHNOLOGY, INC.,

Defendant.

Civil Action No.: 1:15-cv-999

**TRIAL BY JURY DEMANDED**

**COMPLAINT FOR PATENT INFRINGEMENT**

Plaintiff, ALLEN VIDEO TECHNOLOGY, INC., by its attorneys, hereby complains against Defendant OPTOMA TECHNOLOGY, INC. as follows:

**I. PARTIES**

1. Plaintiff, ALLEN VIDEO TECHNOLOGY, INC. (“AVT”) is a corporation organized and existing under the laws of the State of Maryland.

2. Defendant OPTOMA TECHNOLOGY, INC. (“OPTOMA”) is a corporation organized and existing under the laws of the State of California, with its principal place of business located at 3178 Laurelview Ct., Fremont, CA 94538.

**II. JURISDICTION AND VENUE**

3. This Court has exclusive subject matter jurisdiction pursuant to 28 U.S.C. §§ 1331 and 1338(a) because this action arises under the patent laws of the United States, including 35 U.S.C. § 271 *et seq.* This Court has personal jurisdiction over OPTOMA because it has committed acts giving rise to this action within Maryland and this judicial district and it has established minimum contacts within the forum such that the exercise of jurisdiction over OPTOMA would not offend traditional notions of fair play and substantial justice.